

GOODSILL ANDERSON QUINN & STIFEL  
A LIMITED LIABILITY LAW PARTNERSHIP LLP

BARBARA A. PETRUS 3238-0

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ANNE T. HORIUCHI BELL 7116-0

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Honolulu, Hawaii 96813

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Attorneys for Plaintiff

JOHN A. MOFFETT

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

JOHN A. MOFFETT,

Plaintiff,

vs.

SMF SYSTEMS CORPORATION, a  
Maryland corporation; TOM  
CAFFREY; RUBY CAFFREY; DOE  
CORPORATIONS 1-20; DOE  
PARTNERSHIPS 1-20; DOE  
ENTITIES 2-10; JOHN DOES 1-20;  
JANE DOES 1-20; DOE  
GOVERNMENTAL AGENCIES 1-20,

Defendants.

CIVIL NO. 03-00130 HG/BMK

PLAINTIFF'S FINAL PRETRIAL  
STATEMENT; CERTIFICATE OF  
SERVICE

DATE: MAY 3, 2005

TIME: 9:00 A.M.

JUDGE: HON. BARRY M. KURREN

TRIAL: JUNE 14, 2005

JUDGE: HON. HELEN GILLMOR

WITNESS	TESTIMONY
	Monica Nelson's complaint to him about sexual harassment; his knowledge of Plaintiff's complaint to him about the sexual harassment of Nelson and of other illegal and/or improper activities at Defendant SMF Systems; his knowledge of Defendants' failure to respond to those complaints; his knowledge of Plaintiff's termination from employment and his knowledge of the October 2000 e-mail from Plaintiff to Defendants Tom and Ruby Caffrey regarding Plaintiff's complaints.
Nekoorad-Long, Haleh	Will testify as to liability and damages including, but not limited to: her treatment of Plaintiff.
Nelson, Monica	Will testify as to issues of liability including, but not limited to: her employment at SMF and Fort Shafter; the harassment by Millard and Wes Green; her reports of the harassment to Nehmad; SMF's response to her reports of harassment; her giving Plaintiff authority to act on her behalf as to the harassment; her knowledge of illegal and/or improper activities at SMF and TNOSC; Millard's improper control over SMF employees; her participation in government investigations into Millard and SMF; and her termination from SMF.
Noel, Peter	Will testify as to issues of liability including, but not limited to: his employment at SMF and Fort Shafter; his knowledge of illegal and/or improper activities at SMF and TNOSC; Millard's improper control over SMF employees; his participation in government investigations into Millard and SMF; his knowledge of Plaintiff's work at SMF; the hiring of Langley as project manager.
O'Brennan, Laura	Will testify as to issues of liability including, but not limited to: SMF's contract to provide technical services to support the 516 <sup>th</sup> Signal

**V. MISCELLANEOUS**

Not applicable.

DATED: Honolulu, Hawaii, April 26, 2005.

A handwritten signature in cursive script, appearing to read "Barbara A. Petrus", is written over a horizontal line.

BARBARA A. PETRUS  
DONNA H. KALAMA  
ANNE T. HORIUCHI BELL

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JOHN A. MOFFETT

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vs.

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Maryland corporation; et al.,

Defendants.

CIVIL NO. 03-00130 HG/BMK

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was duly served on this date  
upon the following person(s) at the address(es) listed below by the means  
indicated:

LYNNE T. T. TOYOFUKU, ESQ.  
NICHOLE K. SHIMAMOTO, ESQ.  
Marr Hipp Jones & Wang  
1001 Bishop Street, 1550 Pauahi Tower  
Honolulu, HI 96813

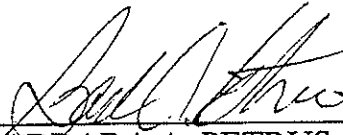
Mail  
X

Hand Delivery

H. CLYDE LONG, ESQ.  
950 Risa Road, 2<sup>nd</sup> Floor  
LaFayette, CA 94549

X

DATED: Honolulu, Hawaii, April 26, 2005.

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JOHN A. MOFFETT

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Attorneys for Plaintiff

JOHN A. MOFFETT

FILED IN THE  
UNITED STATES DISTRICT COURT  
DISTRICT OF HAWAII

AUG 01 2005

at 3 o'clock and 50 min M  
SUE BEITIA, CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF HAWAII

JOHN A. MOFFETT,

Plaintiff,

vs.

SMF SYSTEMS CORPORATION, a  
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CAFFREY; RUBY CAFFREY; DOE  
CORPORATIONS 1-20; DOE  
PARTNERSHIPS 1-20; DOE  
ENTITIES 2-10; JOHN DOES 1-20;  
JANE DOES 1-20; DOE  
GOVERNMENTAL AGENCIES 1-20,

Defendants.

CIVIL NO. 03-00130 MLR/BMK

PLAINTIFF'S FIRST AMENDED  
FINAL PRETRIAL STATEMENT;  
CERTIFICATE OF SERVICE

TRIAL: SEPTEMBER 19, 2005

JUDGE: HON. MANUEL L. REAL

WITNESS	TESTIMONY
Nekoorad-Long, Haleh	Will testify as to liability and damages including, but not limited to: her treatment of Plaintiff.
Nelson, Monica	Will testify as to issues of liability including, but not limited to: her employment at SMF and Fort Shafter; the harassment by Millard and Wes Green; her reports of the harassment to Nehmad; SMF's response to her reports of harassment; her giving Plaintiff authority to act on her behalf as to the harassment; her knowledge of illegal and/or improper activities at SMF and TNOSC; Millard's improper control over SMF employees; her participation in government investigations into Millard and SMF; and her termination from SMF.
Noel, Peter	Will testify as to issues of liability including, but not limited to: his employment at SMF and Fort Shafter; his knowledge of illegal and/or improper activities at SMF and TNOSC; Millard's improper control over SMF employees; his participation in government investigations into Millard and SMF; his knowledge of Plaintiff's work at SMF; the hiring of Langley as project manager.
O'Brennan, Laura	Will testify as to issues of liability including, but not limited to: SMF's contract to provide technical services to support the 516 <sup>th</sup> Signal Brigade at Fort Shafter, Hawaii.
Olsen, Matthew	Will testify as to issues of liability, including, but not limited to: SMF's contract to provide technical services to support the 516 <sup>th</sup> Signal Brigade at Fort Shafter, Hawaii.
Pay, Peter	Will testify as to issues of liability including, but not limited to: his knowledge of Defendant SMF Systems' corporate structure, its business in Hawaii, and of its relationship to SMF Systems Technology Corporation.

2005.

**T. ESTIMATE OF TRIAL TIME**

Plaintiff estimates that trial of this matter will take between 8 and 10 court days.


**U. CLAIMS OF PRIVILEGE OR WORK PRODUCT**

None of the matters required to be stated by LR16.6 are claimed to be privileged or work product.

**V. MISCELLANEOUS**

Not applicable.

DATED: Honolulu, Hawaii, August 1, 2005.

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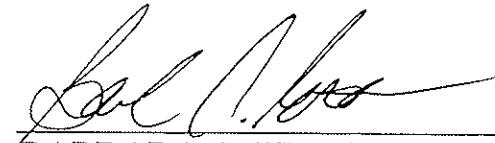
Mail  
X

Hand Delivery

H. CLYDE LONG, ESQ.  
950 Risa Road, 2<sup>nd</sup> Floor  
LaFayette, CA 94549

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